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15 **UNITED STATES DISTRICT COURT**  
16 **DISTRICT OF NEVADA**

17 ALLSTATE INSURANCE COMPANY,  
ALLSTATE PROPERTY & CASUALTY  
18 INSURANCE COMPANY, ALLSTATE  
INDEMNITY COMPANY, and ALLSTATE  
19 FIRE & CASUALTY INSURANCE  
COMPANY,

20 Plaintiffs,

21 v.

22 MARJORIE BELSKY, MD; MARIO  
23 TARQUINO, MD; MARJORIE BELSKY,  
MD, INC., doing business as INTEGRATED  
24 PAIN SPECIALISTS; and MARIO  
TARQUINO, MD, INC., DOES 1-100, and  
25 ROES 101-200,

26 Defendants.

27 AND RELATED CLAIMS  
28

CASE NO. 2:15-cv-2265-MMD-DJA

**STIPULATION AND ORDER TO  
EXTEND THE DEADLINE FOR  
PARTIES TO RESPOND TO MOTIONS  
FOR SUMMARY JUDGMENT [ECF 518]  
and [ECF 522]**

**[FIRST REQUEST]**

1 Plaintiffs and Counterdefendants, ALLSTATE INSURANCE COMPANY, ALLSTATE  
 2 PROPERTY & CASUALTY INSURANCE COMPANY, ALLSTATE INDEMNITY COMPANY,  
 3 and ALLSTATE FIRE & CASUALTY INSURANCE COMPANY (hereinafter “Allstate Parties”),  
 4 and Defendants and Counterclaimants MARJORIE BELSKY, M.D., MARIO TARQUINO, M.D.,  
 5 MARJORIE BELSKY, M.D., INC. d/b/a INTEGRATED PAIN SPECIALISTS, and MARIO  
 6 TARQUINO, M.D., INC. (hereinafter “Belsky Parties”), by and through their respective attorneys of  
 7 record, stipulate and agree to extend the May 5, 2023, deadline for all parties to respond to their  
 8 respective Motions for Summary Judgment filed on April 14, 2023, Allstate Parties [ECF 518] and  
 9 Belsky Parties [ECF 522], extending the deadline for responses to each motion to June 19, 2023.

10 1. The extension is due to work load issues and scheduling conflicts for respective  
 11 counsel for the Allstate Parties (Todd W. Baxter) and the Belsky Parties (Peter S. Christiansen), and in  
 12 light of the critical importance of the Belsky Parties’ motion as to Allstate’s claims herein and the  
 13 Allstate Parties’ motion on the Belsky Parties’ counterclaims, an extension of time is necessary to  
 14 complete work on the motions.

15 2. Counsel for Allstate Parties, Mr. Baxter, is preparing a reply to an opposition to  
 16 Allstate’s motions for summary judgment on the Defendants Counterclaims in the case of *Allstate v.*  
 17 *Shah* Case No. 2:15-cv-01786-APG-DJA. That reply is due on April 28, 2023. Mr. Baxter also has  
 18 an appellate opening brief due on April 28, 2023, another opening brief due on May 3, 2023, as well  
 19 as a third opening brief due on May 13, 2023, in the state Court of Appeal in Fresno, California.

20 3. Counsel for the Belsky Parties, Mr. Christiansen, has a trial in May. The case is  
 21 entitled *State of Nevada v. Durwin Allen*, C-17-323628-1. The case involves two counts of First  
 22 Degree Murder and one count of Attempted Murder. The trial court will not extend the matter out any  
 23 further and there is a firm trial setting of May 30, 2023. Because of the number of victims, potential  
 24 witnesses and physical evidence, as well as the severity of the crimes and potential penalty, the trial  
 25 requires substantial preparation not only of Mr. Christiansen, but of other lawyers within the firm.

26 4. Further, this Court requested that the parties brief the issue of whether this matter is a  
 27 related case to the *Allstate v. Shah* matter detailed above. That order was issued on April 14, 2023  
 28 and the parties filed and served their responses on April 21, 2023.

5. There are a number of issues and claimants involved in this case, with extensive discovery having been completed that must be summarized for purposes of responding to the motions that have been filed. The motion for summary judgment filed by the Belsky Parties contains a 45-page points and authorities, with an extensive amount of exhibits attached thereto that must be reviewed and summarized. The motions at issue are of critical importance; however, due to the existing work schedule of counsel for both parties, including, but not limited to, substantial appellate briefing in other matters and briefing of a reply to an opposition for summary judgment for Allstate Parties in a separate case, as well as an upcoming trial for Belsky Parties counsel, in order to ensure that the parties have a full and adequate opportunity to respond to the motions [ECF No. 518 and 522], good cause exists to extend the dispositive motion deadline to June 19, 2023.

6. Although counsel for the Allstate Parties and the Belsky Parties have begun to work on the responses to the respective motions and will diligently work on those oppositions, additional time is needed due to work-related issues and scheduling conflicts.

7. Thus, the parties stipulate and agree to extend the deadline for dispositive motions from May 5, 2023 to June 19, 2023.

8. This stipulation is made in good faith and not to delay the proceedings.

Trial has not been scheduled in this matter.

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

DATED this 25th day of April, 2023

DATED this 25th day of April, 2023

FAIN ANDERSON VANDERHOEF  
ROSENDAHL O'HALLORAN  
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CHRISTIANSEN LAW OFFICES

By: /s/ Todd W. Baxter

By: /s/ Peter S. Christiansen

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6 Counterdefendants*

7 IT IS SO ORDERED.

8 DATED: April 26, 2023

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*Attorneys for Defendants  
Counterclaimants*



UNITED STATES DISTRICT COURT JUDGE